

3.

On January 20, 2021, I reported a racially discriminatory incident on behalf of my minor son, to Dr. Doolittle, principal of Parkway Elementary School.

4.

I made racial discrimination complaints on behalf of my minor son, a black boy named Jr. that Ms. Owens, a white female counselor, had undermined his dignity and embarrassed my son because of his black boy identity.

5.

On February 24, 2021, and several times thereafter, I made complaints of racial discrimination to various Columbia County School District employees including Dr. Doolittle, Dr. Williams, Ms. Owens and Ms. Sherman.

6.

Despite my requests, Columbia County did not implement any interventions to protect my son from future interactions with Ms. Owens.

7.

I repeatedly requested interventions from Dr. Doolittle and Columbia County School District to eliminate contact between Jr. and Ms. Owens.

8.

I repeatedly requested interventions from Dr. Doolittle and Columbia County School District asking them to transfer Ms. Owens to another location and/or provide Ms. Owens with diversity and inclusion training.

9.

After I made a good faith complaint of racial discrimination, just months later, Columbia County School district retaliated against me by having me reassigned from Parkway Elementary School when they called my Magellan supervisor and requested that I be reassigned.

10.

Dr. Doolittle's allegations that I "disrupted" the learning environment at Parkway Elementary School are false. I did not follow Jr. around between classes at Parkway Elementary School. I did not interfere with the learning environment at

Parkway Elementary School. I continued to complete my assigned job duties—providing counseling to MFLC students—until I was reassigned from my post at Parkway Elementary School.

11.

Prior to reporting racial discrimination in January 2021, I had no knowledge of Magellan's so-called policy prohibiting MFLC counselors from working at the same school that their child attends. Magellan's written conflict of interest policy does not explicitly prohibit parents from working at the same schools that their children attend.

12.

When I was hired by Magellan in February 2015, I was not asked where my son attended school.

13.

When I was hired by Magellan in February 2015, I was not presented with any conflict-of-interest paperwork to disclose where my son attended school.

14.

But-for Columbia County School District's request that I be reassigned from Parkway Elementary, I would have remained in my placement at Parkway Elementary. The normal course of behavior at Magellan was for counselors to remain at their current assigned school unless there was a problem with that assignment. For the duration of my employment at Magellan, Magellan has not implemented any "rotation" of counselor assignments.

15.

After I made a good faith complaint of racial discrimination, just months later, Columbia County School district retaliated against me by eliminating my opportunity to return to Columbia County School District for the 2021-2022 academic term.

16.

On or about April 1, 2021 I called Ms. Sherman and requested that Ms. Owens not have any further conversations with Jr. Ms. Sherman agreed to relay my request to Dr. Doolittle.

17.

On January 20, 2021, Jr.'s father and I met with Dr. Doolittle and Ms. Owens. Then, Jr. was called into the meeting.

18.

I have read the above and it is true and correct and based upon my personal knowledge. I have been given the opportunity to make changes to this declaration.

19.

As provided by 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 22nd day of May, 2023.

Signature of Affiant Janelle S. Quinn

Date May 22, 2023

State of Georgia

County of Fulton

Signed and sworn to (or affirmed) before me on May 22, 2023 (Date)

By Janelle Quinn
Christan Rozzell

Signature of Notary Public

Christan Rozzell

Name of Notary Public (Seal)

My Commission Expires: September 14, 2026

